

ESTTA Tracking number: **ESTTA477302**

Filing date: **06/11/2012**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91200486
Party	Defendant Ronald Etienne Brown
Correspondence Address	EDWARD S WRIGHT LAW OFFICES OF EDWARD S WRIGHT 1100 ALMA STREET, SUITE 207 MENLO PARK, CA 94025-3344 UNITED STATES twright@claim1.com
Submission	Answer
Filer's Name	Edward S. Wright
Filer's e-mail	twright@claim1.com, mcerimeli@claim1.com
Signature	/esw/
Date	06/11/2012
Attachments	TL-75186-3 Answer.pdf ( 2 pages )(59415 bytes )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

MINNESOTA TWINS, LLC,	)	
	)	
Opposer,	)	Opposition No. 91200486
	)	
v.	)	Mark: TWINS
	)	
RONALD ETIENNE BROWN,	)	
	)	Serial No.: 77/316,949
Applicant.	)	

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**ANSWER TO NOTICE OF OPPOSITION**

Applicant, Ronald Etienne Brown, responds as follows to the Notice of Opposition on file in this matter:

1. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 1, and therefore denies the same.
2. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 2, and therefore denies the same.
3. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 3, and therefore denies the same.
4. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 4, and therefore denies the same.
5. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 5, and therefore denies the same.
6. The allegations of Paragraph 6 are admitted.
7. The allegations of Paragraph 7 are admitted.
8. The allegations of Paragraph 8 are denied.
9. The allegations of Paragraph 9 are denied.

**First Affirmative Defense**

The Notice of Opposition fails to state a claim upon which relief can be granted and, in particular, fails to state legally sufficient grounds for sustaining the opposition.

## **Second Affirmative Defense**

Applicant's mark, as a whole, when used in connection with applicant's goods, is distinctively different than Opposer's mark and will not cause confusion or mistake and will not deceive as to the source, association, and/or sponsorship of goods bearing the mark.

Respectfully submitted,

s /Edward S. Wright/  
Edward S. Wright  
Reg. No. 24,903  
Attorney for Applicant

Law Offices of Edward S. Wright  
1100 Alma Street, Suite 207  
Menlo Park, CA 94025  
Telephone: (650) 330-0830  
Facsimile: (650) 330-0831

## **PROOF OF SERVICE**

I, Edward S. Wright, a citizen of the United States, over the age of eighteen years, whose business address is 1100 Alma Street, Suite 207, Menlo Park, California, declare under penalty of perjury that the foregoing

### **ANSWER TO NOTICE OF OPPOSITION**

is being served on Opposer by depositing a copy thereof with the United States Postal Service as First Class Mail, postage prepaid, in an envelope addressed as follows to the attorneys of record for Opposer:

COWAN LIEBOWITZ & LATMAN, P.C.  
Mary L. Kevlin  
Richard S. Mandel  
Aryn M. Emert  
1133 Avenue of the Americas  
New York, NY 10036

on June 11, 2012.

s /Edward S. Wright/  
Edward S. Wright